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June 14, 2007

**FILED ELECTRONICALLY and ORIGINAL VIA USPS**

Charles L. A. Terreni, Esq.  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
Synergy Business Park  
Saluda Building  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

RE: Docket No. 2006-37-C -- Petition of the Office of Regulatory Staff for a Rule-Making Proceeding to Examine the Requirements and Standards to Be Used by the Commission When Evaluating Applications for Eligible Telecommunications Carrier (ETC) Status and When Making Annual Certification of ETC Compliance to the Federal Communications Commission

Dear Mr. Terreni:

In accordance with the Commission Staff's ("Staff") procedural directive at the conclusion of the workshop held on May 25, 2007, in the above-styled matter, Sprint Nextel Corporation ("Sprint Nextel") now submits this summary of the remarks made by counsel at the workshop concerning Staff's proposed interim Guidelines, which include proposed annual reporting requirements for designated eligible telecommunications carriers ("ETCs").

As discussed at the May 25 workshop, Sprint Nextel recommends that the Commission reconsider the requirement in subsection D(b) of the proposed Guidelines ("Filing Deadlines"), which would require ETCs to file their annual reports on August 15 of each year based on data for the twelve-month period ending June 30<sup>th</sup>. A forty-five-day turn-around period is an insufficient amount of time for companies to compile the highly detailed and extensive information identified in subsection D(a) of the proposed Guidelines.

As Sprint Nextel also noted at the workshop, several states and the Federal Communications Commission ("FCC") allow ETCs to compile their annual reports based on data for the most recent calendar year (ending 12/31/xx). In fact, for the annual report due to the FCC by October 1 of each year,<sup>1</sup> carriers are allowed to compile the reports based on data from the preceding calendar year ending 12/31/xx. If this Commission requires ETCs to establish a unique reporting structure for South Carolina as opposed to

<sup>1</sup> See 47 C.F.R. Section 54.209(b) ("Annual reporting requirements for eligible telecommunications carriers").

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Public Service  
Commission  
Docket No. 2006-37-C

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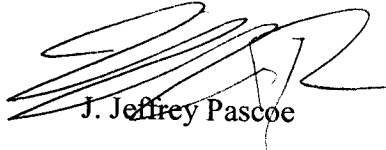
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most or all other jurisdictions, such action would ultimately increase the carriers' administrative costs.

Accordingly, Sprint Nextel strongly urges the Commission to amend subsection D(b) so as to reflect a more reasonable and more obtainable requirement – i.e., basing the August 15 annual reports on data for the most recent calendar year.

Please acknowledge your receipt of this document by file-stamping the copy enclosed and returning it in the enclosed envelope (both enclosed with the original sent via USPS). By copy of this letter, I am serving all parties of record. Please call me if you should have any questions regarding this matter. Thank you for your assistance.

Sincerely,



J. Jeffrey Pascoe

Enclosures

cc: All Parties of Record  
William R. Atkinson, Esq., Sprint Nextel

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is employed by Womble Carlyle Sandridge & Rice and that she has caused Sprint Nextel's Comments in Docket No. 2006-37-C, to be served upon the following via United States Mail, June 14, 2007:

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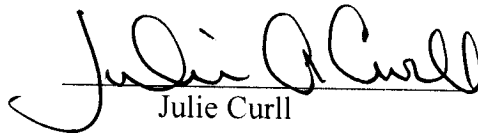
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